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Photo No.	Description
1.	View of the area where Safco formerly operated a distillation unit (SWMU 2) and also location of its former office trailer, facing southwest.
2.	View taken from the same position as photo no. 1, facing south.
3.	View of the north side (entrance) of the Safco operating site, facing southeast.
4.	View of the north side of the Safco operating site, facing south.
5.	View of the area between the two Bjorneby buildings where Safco first operated (SWMU 1), facing southeast.
6.	View of the abandoned vehicle storage area (SWMU 7) just inside of the enclosed Safco site, facing southeast.
7.	View of the flatbed storage trailer (SWMU 6) and the loading pad (SWMU 5), facing southwest. SWMU 5 is visible in the far left hand corner of the photograph
8.	View within the site of the abandoned vehicle storage area (SWMU 7), facing southeast.
9.	View of the container storage unit (SWMU 3), facing south.
10.	View of the container storage unit (SWMU 3), facing southeast.
11.	View from near the front of the container storage unit facing toward the north. The loading dock (SWMU 5) is in the right of the photo.
12.	View of the vehicle parking area (SWMU 4), facing north.
13.	View of the Safco trailer truck and oil stain (left side of photo), facing northeast.
14.	View of the Safco trailer truck with stained soil in the foreground, facing east.
15.	View of the entrance of the container storage area (SWMU 3), facing east.
16.	View of the inside of the container storage area (SWMU 3), facing south.
17.	View of drums at the container storage area (SWMU 3), facing southeast.
18.	View of stained soil in the vehicle parking area (SWMU 4), facing north. Absorbent placed over an oil spill is visible in the upper left corner of the photo.

19. View of the spill area under a trailer in the vehicle parking area (SWMU 4), facing west.

20. View of the northwest corner of the site with the flatbed storage trailer (SWMU 6) on the left, facing south.

21. View of area of the area where the former distillation unit (SWMU 2) was located, facing east.

22. View of the flatbed storage trailer (SWMU 6), facing southeast.

23. View of the northwest corner of the facility, facing south.

C-LINE #52584
35MM PRINTS


5


6


7


8

C-LINE #52584
35MM PRINTS


13


14


4507
15


16

C-LINE #52584
35MM PRINTS

81

SAIC

Science Applications International Corporation
An Employee-Owned Company
Technology Services Company

April 14, 1992 DCN: TZ4-C10021-RN-10163

Ms. Deborah Robinson
U.S. Environmental Protection Agency
Hazardous Waste Division (HW-112)
1200 Sixth Avenue
Seattle, Washington 98101

Re: EPA Contract No. 68-W9-0008
Work Assignment No. C10021, Safco Environmental RPA
SAIC/TSC Project No. 6-788-03-1400-220

Dear Ms. Robinson:

Please find enclosed the RCRA Preliminary Assessment (RPA) report for the Safco Environmental facility located in Seattle, Washington.

Please feel free to contact Kathryn Gladden or myself at 206/485-2818 if you have any questions or comments regarding this report.

Sincerely,

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
Technology Services Company

Louis Craig
Environmental Scientist

Enclosure

cc: M. Bailey, EPA RCRA Site Manager
M. Slater, EPA Region 10 RCRA EPI Coordinator (cover letter only)
T. Tobin, SAIC/TSC RPM (cover letter only)
K. Gladden, SAIC/TSC WAM (cover letter only)

RCRA PRELIMINARY ASSESSMENT
PR/VSI REPORT
SAFCO ENVIRONMENTAL
SEATTLE, WASHINGTON
EPA I.D. NO. WAD981766884

Prepared for:

U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Prepared by:

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EPA Contract No. 68-W9-0008
Work Assignment No. C10021
SAIC/TSC Project No. 6-788-03-1400-220

APRIL 1992

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1.0 INTRODUCTION

This section of the Preliminary Review/Visual Site Inspection (PR/VSI) report covers the purpose and scope of the RCRA Preliminary Assessment (RPA). The contents of the other report sections are also described.

1.1 PURPOSE AND SCOPE OF THE RFA PROGRAM

The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) provide authority to the Environmental Protection Agency (EPA) to require comprehensive corrective action on all solid waste management units (SWMUs) and other areas of concern (AOCs) at interim status hazardous waste management facilities where a release(s) of hazardous constituents has occurred. This includes RCRA interim status facilities, those applying for Part B permits, and those undergoing closure. The intent of this authority is to address previously unregulated constituents released to air, surface water, ground water, and soil and the generation of subsurface gases.

A major activity of the EPA's corrective action program consists of a RCRA Facility Assessment (RFA). According to the EPA's RCRA Facility Assessment Guidance Document (1), the purposes of an RFA are to:

1. Identify and gather information on releases at RCRA-regulated facilities

2. Evaluate solid waste management units and other areas of concern for releases to all media, and regulated units for releases other than to ground water

3. Make preliminary determinations regarding releases of concern and the need for further actions and interim measures at the facility

4. Screen from further investigation those SWMUs which do not pose a threat to human health and the environment

The three basic steps of an RFA consist of a preliminary review (PR) of existing file and other generally available or requested information, a visual site inspection (VSI) to confirm and/or obtain additional information on past or present releases, and when warranted, a sampling visit to fill data gaps by obtaining field and analytical data. The RPA report combines the requirements of a RFA and a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Preliminary Assessment (PA).

1.2 REPORT CONTENTS

This report provides a summary of the PR of files and a VSI performed at the Safco Environmental facility in Seattle, Washington. Primary sources of information utilized in this review include files and correspondence of EPA

Region 10 and the Washington State Department of Ecology (Ecology). The VSI was conducted on February 27, 1992 by Louis Craig, Kathryn Gladden, and Kathy Gross (all of Science Applications International Corporation/Technology Services Company; SAIC/TSC). Safco was represented by Mr. James Johnson, company owner. Mr. Johnson received a VSI Needs Letter from EPA on February 29, 1992 requesting information on site history, SWMU design information, and characteristics of solid and hazardous wastes managed at the facility. At the time the draft RPA report was issued on April 13, 1992, Mr. Johnson had not submitted a written response to this letter. Because SAIC/TSC did not receive a formal response to the VSI Needs Letter from Safco, much of site historical and waste characteristics information presented in this report was obtained from observations made during the VSI and several subsequent follow up telephone conversations with Mr. Johnson.

Section 2.0 of this report describes the Safco Environmental facility and its operations. Information pertaining to the environmental setting is presented in Section 3.0. Section 4.0 provides a description of SWMUs identified in the course of the assessment. The discussion of each SWMU includes unit description, period of operation, wastes managed, release controls, and release history. Conclusions and recommendations for further action at this facility are described in a memorandum separate from this report.

2.0 FACILITY DESCRIPTION

2.1 LOCATION AND HISTORY

Safco Environmental (Safco) is located at 1255 South 188th Street in Seattle, Washington near the southwest corner of Sea-Tac Airport (Figure 1). Safco operates as a transporter collecting containerized hazardous wastes generated by small businesses such as automotive shops or paint businesses. Safco uses the 188th Street facility for consolidation and temporary (less than 10 day) storage of hazardous wastes prior to shipment to TSDFs.(2)

The property where Safco is located is owned by Mr. Robert Bjorneby who also owns and manages two auto repair facilities located adjacent to the current Safco site. Mr. Bjorneby purchased the property in 1976 after leasing it for three years. According to Mr. Johnson, Safco has operated at two different operations at the South 188th Street site. In September 1986, Safco moved its operations from another location in Seattle (2212 South 144th Street) to an area on South 188th Street located between Bjorneby's two automotive facilities (this area is designated as SWMU 1 on Figure 2). Safco operated at this area for approximately two months before moving to a fenced area where they currently operate. Initially, Safco used a trailer located northwest of the fenced operating area for a temporary office. Safco currently maintains a separate office in a building across the street from the site on the west side of Des Moines Way.(2)

2.2 IDENTIFICATION OF SOLID WASTE MANAGEMENT UNITS

During the course of this assessment, seven solid waste management units (SWMUs) were identified. These are listed below in Table 1. Locations of the SWMUs are shown on Figure 2.

Table 1

SOLID WASTE MANAGEMENT UNITS AT SAFCO ENVIRONMENTAL

SWMU NO.	DESCRIPTION
SWMU 1	Former Safco Operations Area
SWMU 2	Former Distillation Unit
SWMU 3	Container Storage Unit
SWMU 4	Vehicle Parking Area
SWMU 5	Loading Dock
SWMU 6	Flatbed Storage Trailer
SWMU 7	Abandoned Vehicle Storage Area

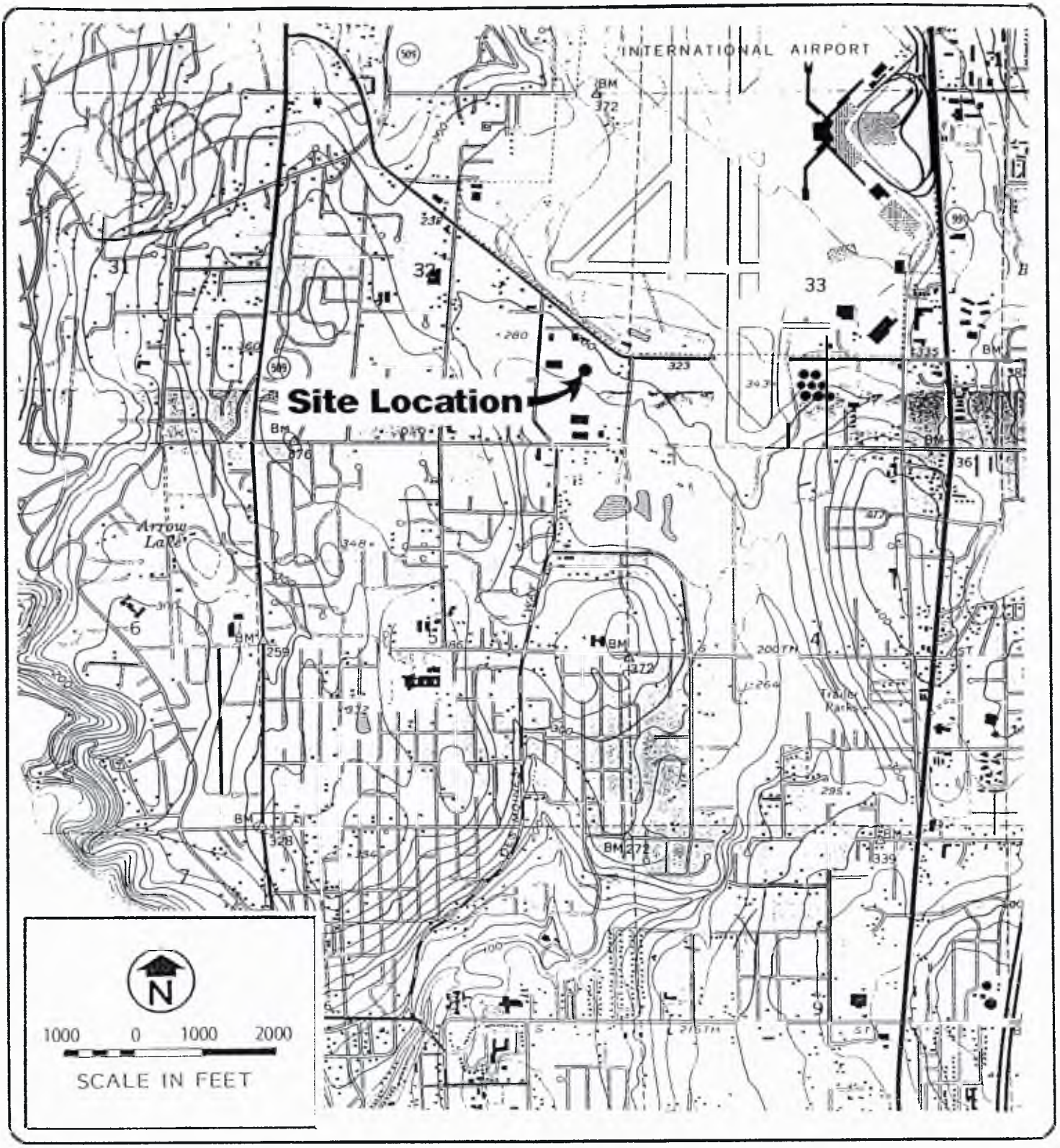


Figure 1

SITE LOCATION MAP
SAFCO ENVIRONMENTAL
SEATTLE, WASHINGTON
Source: USGS 7.5' Topo. Map,
Des Moines, WA Quad, 1973

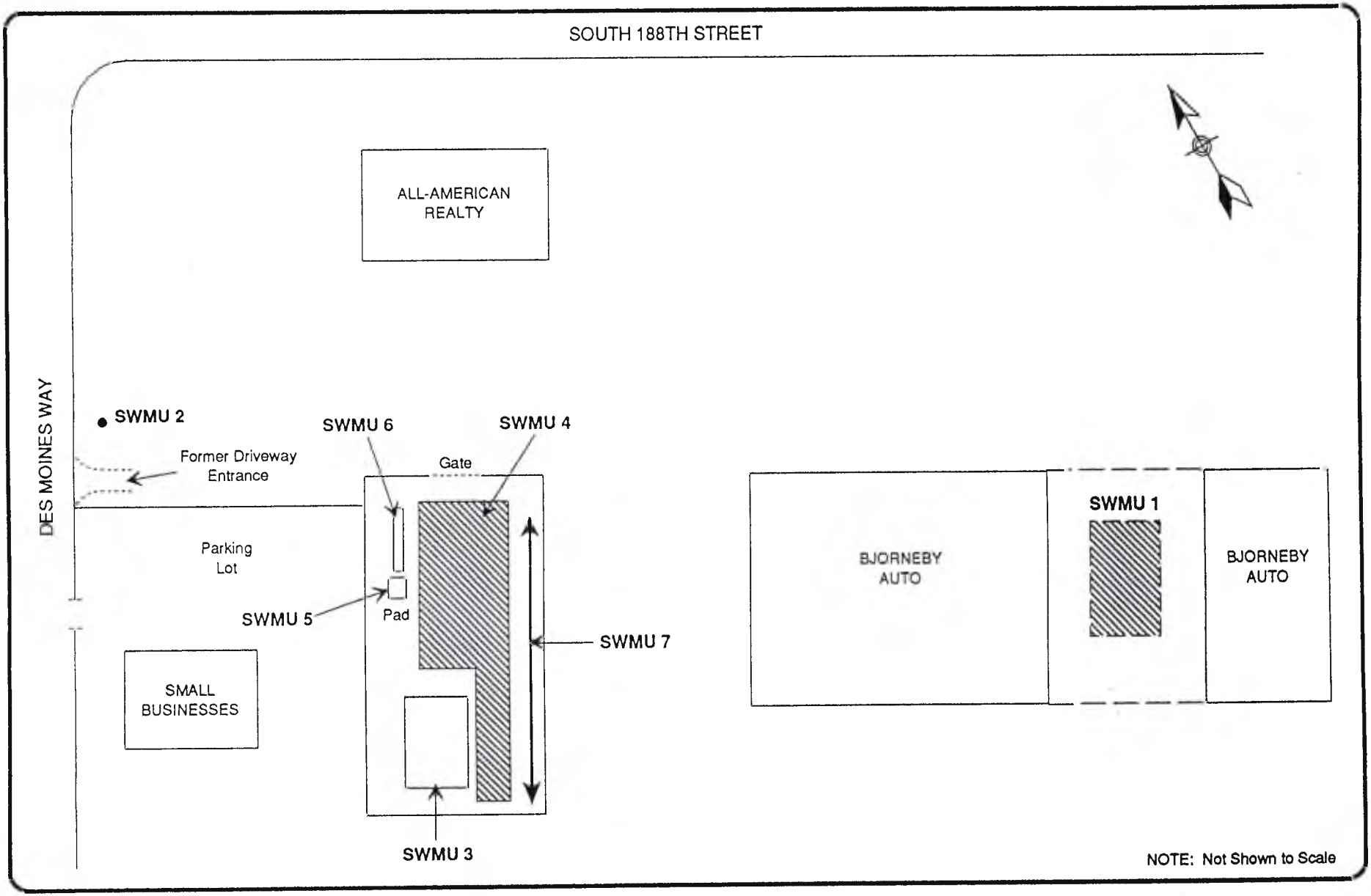


Figure 2

LOCATION OF SWMUs AT SAFCO ENVIRONMENTAL
SEATTLE, WASHINGTON
Source: Reference 2

2.3 FACILITY OPERATIONS

The Safco facility consists of a fenced enclosure which contains a covered container storage unit (SWMU 3), a loading dock (SWMU 5), and a vehicle parking area (SWMU 4). The approximate dimensions of the fenced enclosure are 150 feet by 150 feet. The facility is not paved. At the time of the VSI, two trucks and two semi-trailers were located in the vehicle parking area. The site also contained six abandoned vehicles, one of which was being used for storage of containerized materials; the area where these vehicles were parked has been designated as SWMU 7. A flatbed storage trailer (SWMU 6) located adjacent to the loading dock was being used for the storage of waste oil and recycled paint thinner.(2)

The facility had a general appearance of being poorly maintained (see VSI photographs in Appendix A). There was miscellaneous scrap metal, wood waste, and abandoned equipment scattered throughout the site. Many of the drums at the facility were not clearly labelled as to their contents, were in poor condition, and without adequate containment. The roof over SWMU 3 (the container storage unit) was damaged, causing rainwater to collect on the top of the drums and on the storage pad. There were also visible stained soil and one ongoing waste oil leak from a drum in one of the storage trailers (SWMU 4).(2)

2.3.1 Hazardous Waste Management

As discussed in Section 2.1, the primary function of the Safco facility is to act as an intermediate transfer area for containerized hazardous wastes prior to transport to off-site TSDFs. Safco collects and transports hazardous wastes primarily from small businesses such as autobody shops. From a brief review of manifests conducted during the VSI, the types of hazardous wastes managed at the site consisted of F001 through F005 solvents. Hazardous wastes are handled primarily in the vehicle parking area, SWMU 4. The drummed wastes may be transferred from the incoming truck to another truck located on-site or occasionally to the container storage unit (SWMU 3). According to Mr. Johnson, no hazardous waste was present at the facility the day the VSI was conducted.(2)

In the past, Safco has operated at this facility as a hazardous waste generator. Former activities conducted at the site have also included blending and distillation of waste oils and solvents. The location of a former distillation unit is identified as SWMU 2. Refer to Section 2.4.2. for additional information on Safco's past operations.(2)

2.3.2 Non-Hazardous Solid Waste Management

In addition to managing hazardous wastes, Safco also transports and temporarily stores non-hazardous solid wastes at the 188th Street site. At the time of the VSI, Mr. Johnson stated that drums containing waste oil were stored at the following units: the container storage unit (SWMU 3), the vehicle parking area (SWMU 4), and the flatbed storage trailer (SWMU 6). SAIC/TSC estimated that approximately 200 drums of waste oil were on-site at the time of the VSI. Mr. Johnson also stated that 20 drums observed in storage at the loading dock (SWMU 5) contained a non-solvent based adhesive material and that the material had been stored at that unit for approximately one year. Mr. Johnson also stated that

drums stored at the flatbed storage trailer (SWMU 6) and the abandoned vehicle storage area (SWMU 7) contained recycled paint thinner. Information confirming the composition of these solid wastes was not available at the time the draft RPA report was prepared.(2)

2.4 REGULATORY HISTORY

2.4.1 RCRA Notification and Permit History

On February 27, 1986, Safco Environmental submitted a Notification of Dangerous Waste Activity characterizing themselves as a generator, transporter, and TSDF. The Washington State Department of Ecology (Ecology) inspected the site on June 20, 1987; at the time of this inspection the site was classified as a generator, transporter, and blender. There was no indication in the files that Safco had submitted a revised notification indicating a change in status.(6,15)

2.4.2 Compliance and Enforcement History

On July 20, 1987, the Department of Ecology (Ecology) conducted a RCRA compliance evaluation inspection (CEI) of the Safco facility. The following areas of non-compliance with dangerous waste generator regulations were observed: lack of a personnel training and contingency plan, no cover over the container storage unit (SWMU 3), inadequacies in their annual reports, and offering or transporting dangerous wastes to non-permitted facilities. Ecology sent Safco a warning letter on August 10, 1987 citing the above violations and stating that based on observations made during the inspection, the facility was operating as a TSDF. Based on a follow-up inspection performed on March 3, 1988, Ecology issued Compliance Orders No. DE 88-N135 and No. DE 87-N273 and a Notice of Penalty Incurred and Due No. DE 87-N279.(9,10,11,12,13)

Compliance Order No. DE-88-N135, issued on March 24, 1988, was not contested by Safco. This order required Safco to perform the following: provide interim cover on all liquid waste containers on site within 24 hours, submit plans and specifications for permanent cover and containment for all waste storage and handling areas, prepare a contingency plan within thirty days, and analyze any soil removed from the site for the presence of dangerous wastes.(11)

On April 5, 1988, Ecology issued Safco a Notice of Penalty Incurred and Due No. DE 87-N279 and Compliance Order No. DE 87-N273 which covered the following violations: drum labeling irregularities; representing itself as a small quantity generator TSD; and changing waste code designations. Order Nos. DE 87-N279 and DE 87-N273 were contested by Safco; a Settlement Agreement was reached on June 23, 1989 before the state of Washington Pollution Control Hearing Board (PCHB No. 88-58). The Settlement Agreement reached with Ecology was for three years (until June 23, 1992). Under the terms of the Settlement Agreement, Safco agreed to: correct its hazardous waste labeling irregularities; abide by transporter storage restrictions of 10 days when working solely as a transporter; and work as a recycling (generator) facility only after certain stipulations were met. Safco was fined $10,000 at the time of settlement. Safco was also required to do $27,000 worth of site improvements over a three year period or be required to pay that amount in an additional fine at the end of the settlement period,

June 23, 1992. According to Ms. Barbara Smith (Ecology Northwest Regional Office), Safco did not pay the original $10,000 fine; the account was recently turned over to a collection agency.(12,13,27)

There is no indication in the file documents reviewed that the facility has been inspected by EPA or Ecology subsequent to the March 3, 1988 site visit performed by Ecology. Ms. Smith said that Ecology plans to conduct a RCRA CEI of the Safco facility sometime in the spring of 1992.

3.0 ENVIRONMENTAL SETTING

3.1 LOCATION AND SURROUNDING LAND USE

The Safco Environmental (Safco) facility is located at 122°11'40" longitude and 47°29'3" latitude in the northwest 1/4 of the southeast 1/4 of Section 32, T23N R4E. The facility is located in an area of industrial and commercial use; gravel pits are present 1,800 feet to the south and 1,700 feet north-northeast. Sea-Tac Airport is adjacent to the facility to the northeast, and a sewage treatment plant is due east of the site. Woodside School is 1,300 feet west of the facility, Manhattan School is 1,900 feet to the west, and the North Hill School is 4,800 feet to the south-southwest. There is one on-site worker at the Safco facility. The closest permanent resident is located approximately 1,000 feet from the site and the nearest business operates in a building about 100 feet from the site. Population within four miles of the site is distributed as follows:

- 0 - 0.25 mile: 45
- 0.25 - 0.5 mile: 1,528
- 0.5 - 1 mile: 4,052
- 1 - 2 miles: 13,132
- 2 - 3 miles: 27,980
- 3 - 4 miles: 24,464

(References: 16,17)

3.2 METEOROLOGY

The Safco facility is located in the Puget Sound Lowland, which has a mid-latitude, west coast marine climate. Annual precipitation is approximately 34 inches per year and evapotranspiration is estimated at 18 inches per year. Precipitation occurs primarily in the fall and winter months, with 75 percent between October and March. Summers are usually warm and dry, contributing less than 10 percent of the annual rainfall in the area. Monthly averages of daily minimum and maximum temperatures range from 37°F and 46°F in January to 56°F and 75°F in July. The two year - 24 hour rainfall amount is 1.9 inches.(18,19)

3.3 SURFACE HYDROLOGY

The Safco facility is situated at an elevation of approximately 240 feet above mean sea level in the Des Moines Drift Plain of southwestern King County. Surface drainage is to the south, as reflected in the southward slope of the land surface at a grade of 3.5 per cent. The upgradient drainage area is limited to an area of approximately 35 acres by the drainage divide uphill of the site formed grading and leveling of the area to the northeast of the site at Sea-Tac Airport. The site area is characterized sandy and gravelly soils formed on Vashon Till and Vashon recessional outwash deposits.(16,20)

The site is located in the area served by King County Water District 49, which

purchases its water supply from the city of Seattle water supply system. Surface runoff from the site drains into a lake on the Tyee Valley Golf Course 3,000 feet southeast of the facility. This lake discharges to an unnamed stream that flows southwest and discharges to Puget Sound approximately one mile downstream. The site does not discharge to any other drainage basin.(16,21,22)

3.4 GEOLOGY AND GROUND WATER HYDROLOGY

3.4.1 Regional Geology and Ground Water Hydrology

The Safco facility is located on the Des Moines Drift Plain in the Puget Sound Lowland. The area is characterized by a sequence of Quaternary glacial and post-glacial sediments overlying Tertiary bedrock units. The uppermost bedrock unit in the vicinity of the site is the Puget Group of late Tertiary age. The Puget Group is a sequence of well-lithified, fine-grained sandstones derived from volcanic material of the Cascade Range. The Puget Group underlies several hundred feet of Quaternary glacial and post-glacial sediments in the area of the facility and is not used as a water supply resource in this part of King County. (21,23)

The Quaternary sediments in the vicinity of the Safco facility include pre-Vashon stratified drift and till deposits. The pre-Vashon glacial units consist primarily of outwash sand and gravel and low permeability till. Vashon stage glacial deposits in the area include Vashon Advance Outwash, ice contact deposits and Vashon Till. Vashon Advance Outwash and ice-contact deposits are typically sand and gravel units that provide significant sources of water in the region. Vashon Till and ice-contact deposits occur in the uplands of the West Seattle Drift Plain. These glacial deposits include aquifers that serve as a significant water supply in the region; however, these units are not used for water supply within four miles of the site.(21,22)

3.4.2 Local Geology and Ground Water Hydrology

Drinking water is provided by King County Water District No. 49 and the Bryn Mawr Water District at the facility and surrounding areas. Ground water is supplied to 4,900 users by the Bryn Mawr Water District from a well located between one and two miles from the facility. Twenty five users are supplied by public supply wells between two and three miles from the facility.(21,22)

Ground water is present beneath the facility at approximately 50 feet below ground surface, based on the observed elevations of the ground surface at the facility and the water level of the lake southeast of the facility. The topographic setting of the site and the presence of the lake as an intersection of the water table and the ground surface indicate that the lake is probably a localized discharge area, with ground water at the site flowing southeast.(16,23)

3.5 CRITICAL HABITATS/ENDANGERED OR THREATENED SPECIES

According to the Washington State Department of Fish and Wildlife when contacted, there are no endangered or threatened species of flora or fauna, critical habitats, or wilderness areas located within a three-mile radius of the facility.

Wetland acreage was estimated within four miles of the site in the same increments as the population (Section 3.1). The acreage of wetland in each increment varied from five acres to twenty-five acres. A total of approximately eighty-five acres of wetland are contained within four miles of the site.(24)

3.6 SITE CONTAMINATION

According to Mr. Johnson, no soil or ground water sampling has been performed at the facility in response to releases of hazardous materials. No sampling information was found in the file documents reviewed. Mr. Johnson stated that there have been minor spills which were cleaned up at the time that they occurred. At the time of the VSI, a spill of waste oil was observed underneath a storage trailer at SWMU 4, the vehicle parking area (see Section 4.4).

4.0 DESCRIPTION OF INDIVIDUAL UNITS

Seven solid waste management units (SWMUs) were identified and evaluated during the preliminary review (PR) and/or visual site inspection (VSI). The following sections provide descriptive and historical information on each SWMU.

4.1 SWMU 1 - FORMER SAFCO OPERATIONS AREA (Photo No. 5)

4.1.1 Information Summary

Unit Description: SWMU 1, the former Safco operations area, consists of the area bounded by fences on the north and south, and by Bjorneby Auto facilities on the east and west sides (Figure 2). The area is currently lightly graveled. This was the first area used by Safco when it moved to this site in August or September of 1986. This unit was used for temporary storage of containers of hazardous wastes acquired by Safco on a transfer basis. Mr. Johnson stated that the unit had a cement pad, with approximate dimensions of five feet by six feet. Mr. Johnson also stated that a truck parked on-site was used to temporarily hold drummed wastes awaiting transport.(2)

Dates of Operation: SWMU 1 was used for approximately two months starting in late August to mid September of 1986. This unit is currently used for the operations of Bjorneby Auto.(2)

Wastes Managed: This unit was used for temporary storage of hazardous wastes which included solvents and waste oil generated at small businesses such as auto body shops and auto maintenance shops.(2)

Release Controls: This unit had no secondary containment.(2)

History of Releases: There is no documented record of spills occurring at this unit.

4.1.2 Conclusions

Because this unit was used for a short duration and is currently not in use by Safco, the potential for releases to soil, ground water, surface water, and air are judged to be low. The potential for subsurface gas generation is also judged to be low because the unit was located above ground.

4.2 SWMU 2 - FORMER DISTILLATION UNIT (Photo No. 1)

4.2.1 Information Summary

Unit Description: SWMU 2, the former distillation unit, was used by Safco to recycle spent solvents. Mr. Johnson stated during the VSI that the design and operation of this unit was proprietary information.(2)

Dates of Operation: The unit was operated in 1987 and 1988. The distillation unit was sold to another business after that time.(2)

Wastes Managed: This unit was used to recycle solvents.(2)

Release Controls: The exact nature of the secondary containment of this unit when active is not known.

History of Releases: There is no record of releases from this unit.

4.2.2 Conclusions

Because this unit was used to treat small volumes of hazardous wastes and because the unit is no longer on-site, the potential for releases to soil, ground water, surface water, and air is judged to be low. The potential for subsurface gas generation is judged to be low because the unit was located above ground.

4.3 SWMU 3 - CONTAINER STORAGE UNIT (Photo Nos. 9, 10, 15, 16, 17)

4.3.1 Information Summary

Unit Description: SWMU 3, the container storage unit, consists of a cement pad which is covered by a fiberglass roof. The unit is used as a transfer station (storage less than ten days) for drums of hazardous waste and also for storage of drums containing non-hazardous solid wastes. The pad is approximately 10 feet by 30 feet. The pad has a cement berm on three sides which is approximately six inches high. The north side of the pad is not bermed. The south-western-most section of the roof (approximately 8 feet by 10 feet) had been blown off by wind and was detached during the VSI. The roof had no overhang and the drums had standing water on the lids even though there had been no rain in the last few days prior to the VSI. A trench in the soil about a foot deep drains any runoff from the pad into an unlined pit located just off the southwestern corner of the pad. The unit held approximately 75 drums during the VSI. As discussed in Section 2.4.2, this unit was the subject of Ecology enforcement action during 1988 to 1989 that required Safco to construct a roof over this unit.(2)

Dates of Operation: This unit was constructed in 1987 and is currently in use.(2)

Wastes Managed: This unit is a storage area for containerized solid waste. At the time of the VSI, Mr. Johnson stated that waste oil and waste oil contaminated materials such as oil filters, dirt, or rags were stored at the unit. Potential hazardous constituents in waste oil include toluene, benzene, xylene, ethylbenzene, and heavy metals. SWMU 3 is also used as a staging area for hazardous waste drums.(2,25,26)

Release Controls: The unit is bermed on three sides; the north side is not bermed. The north side of the unit has a trench in the soil which would catch any liquids released from the unit. The trench drains into an unlined pit just off the southwestern corner of pad. The roof of the southwestern corner of the unit (approximately 8 feet by 10 feet) had broken off and was down during the VSI. Rain collects on the pad since the roof is high and without an overhang.(2)

History of Releases: There are no documented releases from this unit. No evidence of releases was seen during the VSI.

4.3.2 Conclusions

Because this unit does not have adequate containment and the drums were observed to be in poor condition, the potential for releases to soil is judged to be moderate. The potential for releases to ground water is judged to be low to moderate since the depth to ground water is 50 feet. The potential for release to surface water is judged to be low to moderate because of the distance to the nearest water body (3,000 feet away). The potential for subsurface gas generation is judged to be low since all the wastes are stored above ground. The potential for releases to air is judged to be low because containers stored at this unit are normally kept closed.

4.4 SWMU 4 - VEHICLE PARKING AREA (Photo Nos. 8, 12, 13, 14, 18, 19)

4.4.1 Information Summary

Unit Description: SWMU 4, the vehicle parking area, consists of most of the utilized ground area within the current operating site (Figure 2). The ground surface is lightly graveled soil. At the time of the VSI, there were two trailers and a semi-truck all containing 55-gallon drums parked at this unit. Also, an enclosed trailer was being used for storage of waste oil at the time of the VSI.(2)

Dates of Operation: The unit began operation in the fall of 1986; it is currently active.(2)

Wastes Managed: At the time of the VSI, Mr. Johnson stated that waste oil was being stored on a trailer parked at this area. Potential hazardous constituents in waste oil include toluene, benzene, xylene, ethylbenzene, and heavy metals. Although no hazardous wastes were present at the time of the VSI, they may be temporarily stored on a semi-truck for staging prior to shipment to an off-site TSDF. Potential hazardous constituents in hazardous wastes managed by the facility are those solvents contained in F001 through F005 RCRA wastes.(2,25)

Release Controls: There is no secondary containment for this unit. The ground is bare soil covered with scattered gravel.(2)

History of Releases: During the VSI, a release of petroleum products was observed from this unit. A Safco employee was observed shoveling contaminated soil into a drum and placing sand and absorbent material under a trailer to contain waste oil released from one of the drums stored inside the trailer (Photo Nos. 18 and 19). There was also another visible stain on the ground nearby (Photo Nos. 13, 14, and 18). There are no other documented releases from this unit.(2)

4.4.2 Conclusions

Since there was an observed release during the VSI, the potential for release to soil is high. The potential for releases to surface water and ground water are judged to be moderate because there is a confirmed release to soil. The potential for subsurface gas generation is judged to be low because the unit is above ground. The potential for releases to air is judged to be low because the containers stored in this unit are normally kept closed.

4.5 SWMU 5 - LOADING DOCK (Photo Nos. 7 and 11)

4.5.1 Information Summary

Unit Description: SWMU 5, the loading dock, is a raised concrete pad with dimensions of approximately 10 feet by 10 feet and is approximately four feet above the ground surface. The unit has been used for storage of drums for the last year. In the past, the unit has been used for temporary off loading of drums prior to shipment to an off-site TSDF.(2)

Dates of Operation: The unit was constructed in 1987 at approximately the same time that the container storage unit, SWMU 3, was constructed. The unit has been used as a storage container for approximately one year.(2,25)

Wastes Managed: In the past, this unit had been used to load and unload drums onto trucks. During the VSI, twenty drums were observed at this unit. Mr. Johnson stated that these drums contained a non-solvent based adhesive material that had been stored there for approximately one year.(2,25,26)

Release Controls: There is no secondary containment for this unit.(2)

History of Releases: There is no documentation of releases for this unit.

4.5.2 Conclusions

The potential for releases to ground water, surface water, and soil from current operations is unknown because there is no information documenting the nature of the material contained in the drums stored at the unit. The potential for releases to air from current operations is judged to be low because the drums area normally kept closed. The potential releases from this unit to generate subsurface gas is also judged to be low.

Because this unit was used as a loading dock in the past and had no containment, the potential for releases to soil from past operations is judged to be moderate. The potential for releases to ground water and surface water from past practices is judged to be low.

4.6 SWMU 6 - FLATBED STORAGE TRAILER (Photo Nos. 7 and 22)

4.6.1 Information Summary

Unit Description: SWMU 6, the flatbed storage trailer, abuts the north side loading dock (SWMU 5) located on the west side of the fenced enclosure. The flatbed, which is approximately 30 feet long, is loaded with approximately 50 drums containing waste oil and recycled paint thinner. The drums were not secured and there was no roof over the drums.(2)

Dates of Operation: This unit began operation in late 1986. The flatbed has been used as a storage area in its present location for one and one half to three years.(2,25,26)

Wastes Managed: Mr. Johnson stated that drums stored at the unit contained waste oil and recycled paint thinner.(25,26) At the time of the VSI, there did not appear to be labels on the drums identifying their contents. Potential hazardous constituents in waste oil include toluene, benzene, xylene, ethylbenzene, and heavy metals.

Release Controls: There is no containment for this unit. The surface area in this unit is grass covered soil.(2)

History of Releases: There is no documented records of releases at this unit. No evidence of releases was observed during the VSI.

4.6.2 Conclusions

Because this unit is without containment and has questionable structural stability, the potential for releases to soil is judged to be moderate. The potential for releases to ground water and surface water is judged to be low to moderate. The potential for releases from this unit to air is also judged to be low because the drums are normally kept closed. The potential for releases from this unit to generate subsurface gas is also judged to be low.

4.7 SWMU 7 - ABANDONED VEHICLE STORAGE AREA (Photo Nos. 6 and 8)

4.7.1 Information Summary

Unit Description: SWMU 7, the abandoned vehicle storage area, is the strip along the inside of the east fence of the current Safco operating area. At the time of the VSI, this area contained six abandoned vehicles including one vehicle contained a 55-gallon drums.(2)

Dates of Operation: This unit was first used in late 1986 when Safco began operations within this fenced enclosure; it was active at the time of the VSI.(2,25)

Wastes Managed: This unit is the storage area for several abandoned vehicles. Mr. Johnson stated that one truck parked at this unit contained a drum of recycled paint thinner.(25)

Release Controls: The ground is bare soil with sparse gravel. There is no secondary containment for this unit.(2)

History of Releases: There is no documented record of releases for this unit. No evidence of releases from this unit was observed during the VSI.

4.7.2 Conclusions

The potential for release of hazardous constituents to soil, ground water, and surface water is unknown because there is no information confirming the nature of the materials contained in the drums stored at this unit.

The potential for releases to air from current operations is judged to be low because the drums are normally kept closed. The potential for releases from this unit to generate subsurface gas is also judged to be low.

REFERENCES

1. U.S. EPA. RCRA Facility Assessment Guidance Document. 1986.

2. SAIC/TSC. Field Notes from the February 27, 1992 Visual Site Inspection of the Safco Environmental.

3. Safco Solvent Treatment, Inc. Notification of Dangerous Waste Activities. April 17, 1984.

4. Safco Waste Management. EPA Notification of Dangerous Waste Activities. February 21, 1985.

5. Safco Waste Management. Notification of Dangerous Waste Activities. April 4, 1985.

6. Safco Environmental. Notification of Dangerous Waste Activities. February 27, 1986.

7. Safco Waste Management. Generator Annual Dangerous Waste Report. March 18, 1986.

8. Safco Environmental. Notification of Dangerous Waste Activities. February 27, 1986.

9. Department of Ecology. Warning Letter. August 20, 1987.

10. Department of Ecology. Narrative Inspection Report. September 16, 1987.

11. Department of Ecology. Compliance Order No. DE 88-N135. March 24, 1988.

12. Department of Ecology. Notice of Penalty Incurred and Due No. DE 87-N279. April 5,1988.

13. Department of Ecology. Compliance Order No. DE 87-N273. April 5, 1988.

14. State of Washington Pollution Control Hearing Board. PCHB Nos. 88-58, 88-65, 88-66. June 23, 1989.

15. Department of Ecology. Narrative Inspection Report. July 20, 1987.

16. U.S.G.S., De Moines, Washington, 1:25,000-scale metric topographic map, 7.5 x 15 minute quadrangle. 1983.

17. U.S. Census Bureau. Characteristics of Persons, Seattle King County Standard Metropolitan Statistical Area. 1990 Census Data.

18. Washington State University, College of Agriculture Extension Service. Washington Climate.

19. NOAA Atlas IX, Volume 2.

20. U.S. Department of Agriculture Soil Conservation Service. Soil survey of Southern King County. 1973.

21. Washington Department of Ecology. Water Rights Information System.

22. Washington State Department of Social and Health Services. Public Water Supply Database.

23. Luzier, J. E. Geology and Ground Water Resources for Southwestern King County, Washington Water Supply Bulletin No. 28. 1969.

24. U.S. Fish and Wildlife Service. National Wetlands Inventory. De Moines, Washington 7.5 x 15 Minute Quadrangle.

25. SAIC/TSC (Louis Craig). Telephone Conversation with James Johnson (Safco Environmental). April 6,1992.

26. SAIC/TSC (Louis Craig). Telephone Conversation with James Johnson (Safco Environmental). April 7,1992.

27. SAIC/TSC (Louis Craig). Telephone Conversation with Barbara Smith (Washington Department of Ecology). April 10, 1992.

Appendix A

VSI PHOTOGRAPHS

Photo No.	Description
1.	View of the area where Safco formerly operated a distillation unit (SWMU 2) and also location of its former office trailer, facing southwest.
2.	View taken from the same position as photo no. 1, facing south.
3.	View of the north side (entrance) of the Safco operating site, facing southeast.
4.	View of the north side of the Safco operating site, facing south.
5.	View of the area between the two Bjorneby buildings where Safco first operated (SWMU 1), facing southeast.
6.	View of the abandoned vehicle storage area (SWMU 7) just inside of the enclosed Safco site, facing southeast.
7.	View of the flatbed storage trailer (SWMU 6) and the loading pad (SWMU 5), facing southwest. SWMU 5 is visible in the far left hand corner of the photograph
8.	View within the site of the abandoned vehicle storage area (SWMU 7), facing southeast.
9.	View of the container storage unit (SWMU 3), facing south.
10.	View of the container storage unit (SWMU 3), facing southeast.
11.	View from near the front of the container storage unit facing toward the north. The loading dock (SWMU 5) is in the right of the photo.
12.	View of the vehicle parking area (SWMU 4), facing north.
13.	View of the Safco trailer truck and oil stain (left side of photo), facing northeast.
14.	View of the Safco trailer truck with stained soil in the foreground, facing east.
15.	View of the entrance of the container storage area (SWMU 3), facing east.
16.	View of the inside of the container storage area (SWMU 3), facing south.
17.	View of drums at the container storage area (SWMU 3), facing southeast.
18.	View of stained soil in the vehicle parking area (SWMU 4), facing north. Absorbent placed over an oil spill is visible in the upper left corner of the photo.

19. View of the spill area under a trailer in the vehicle parking area (SWMU 4), facing west.

20. View of the northwest corner of the site with the flatbed storage trailer (SWMU 6) on the left, facing south.

21. View of area of the area where the former distillation unit (SWMU 2) was located, facing east.

22. View of the flatbed storage trailer (SWMU 6), facing southeast.

23. View of the northwest corner of the facility, facing south.

C-LINE #52584


5


6

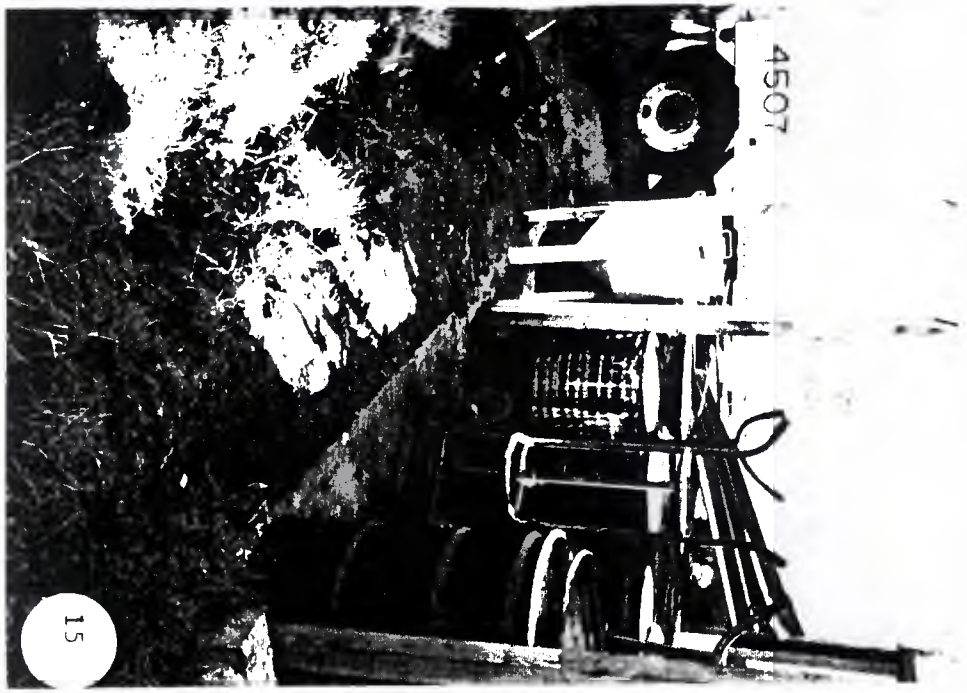

7


8

C-LINE #52584
PHOTO PRINTS


13


14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C LINE #52584
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17


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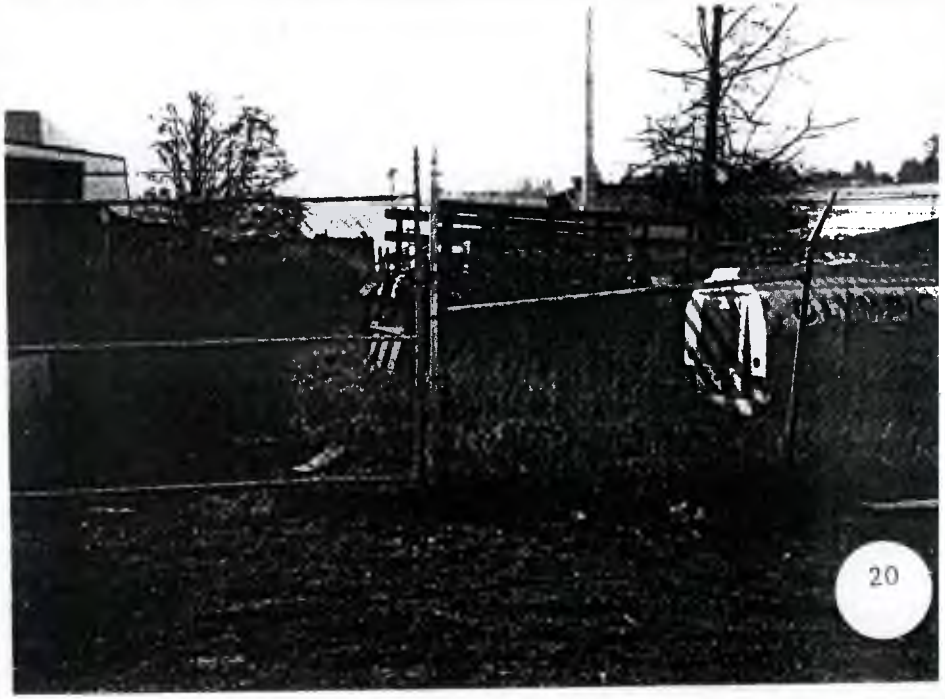
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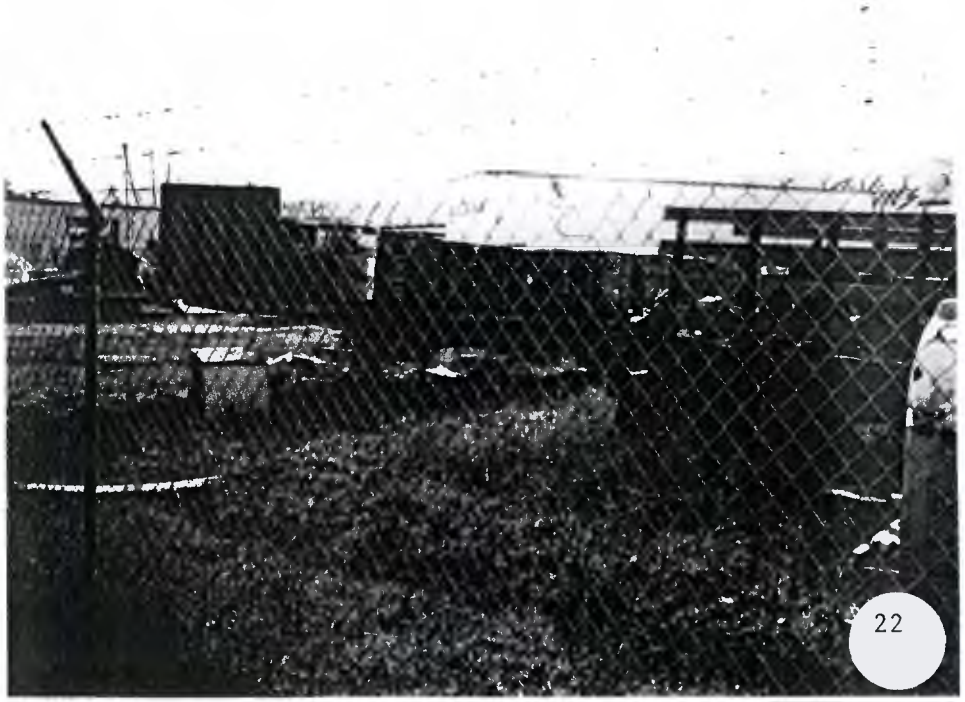
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OLYMPIC
23

Appendix B

VSI FIELD NOTES

Safco Feb 27, 1992
at 188th ST.

0915 K. Gladden with James Johnson
L. Craig
C. Gross

Explained our purpose for EPA
RFA/PI

Left property at 144th in 1986.
At 144th ST. property
oil cans, drums of oil left at site
with Morgan who rented out the
spaces and also worked under a
gov't contract themselves

aug 87 moved here
Bjornsby
Bj (sp.) who owns auto body next door
owns property

graded & put in loading dock
small amount of oil & paint
moved off site when arrived at
the site.
put up roof 10x12 cubicles

Oregon, Wa., Id. Mont. Utah

are customers locations

- pick up fuels & solvents

- currently using company in Oklahoma to ship waste to

- Sufco has no other facility in the state

- in past did some sort mixing & blending

- did extracting,

- Trade secret so won't tell details of extracting.

- Chemical Reclamation in Texas send waste in past generated by blending process.

- Early '87 brought trailer onsite

- business limits to only reshipping wastes

- ESI take waste to

- the sludge mentioned which was on on the pad a few years ago mentioned in Ecology letter was analyzed & ~~dump~~ is still onsite drummed, think it is mostly leaves & debris

- 100 drums/mo. handled.

- has 2 trucks which go around & pick up drummed waste at pick up facilities

1825 offices addition now

Pics 1 & 2

0955 1 - SE SW on area where trailer was and old road cane through

0956 2 - South

0958 3 - looking South towards North part of fenced property

0958 4 - same

5 - east side of B auto Rebuild where Safety first moved

late aug - mid sept Operated
1986 → ~~Staged~~ between the two
Bjorneby's buildings for about 2 months
moved to area within fenced area of
Bjorneby's Auto Shop. for a few
months before moving to fenced area
just on east side of large
B Auto Rebuild building

this site is a graveled area now.
Did have cement pad & truck
parked there with drums waste on it.
cement pad was about 5'X6'

red pump truck onsite

#6 red pump truck onsite - looking SE

#7 site looking SW

#8 - onsite looking SE

- pics of the covered storage area

11, 12 looking N & NE at truck (acme)
which has drums stored on it (waste
oil) truck stored there a month & leak
developed from onboard

13 site of old spill under cab of truck

1025 #14 large Safeo truck partially filled with drums.

15 front entrance of storage area

16 inside storage area - South looking

17 inside storage area - looking SE

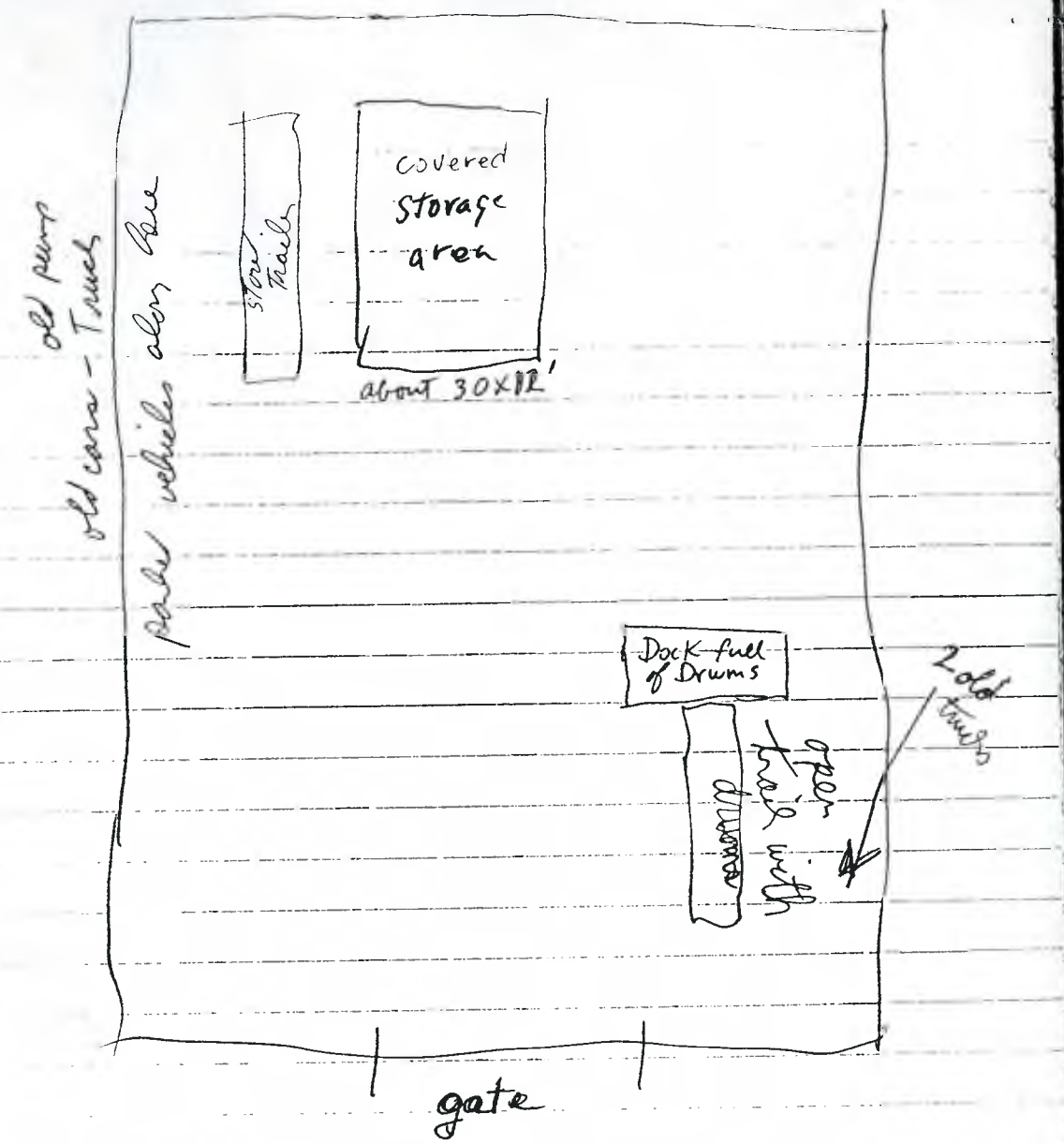
18 - spill area

19 disturbed soil in oil cleanup with truck

20 → site where old shack used to be facing South from outside the site

The covered storage area has cement berms around all sides but the front entrence side dock is full of drums partially covered by a blue tarp

There used to be a graveled road coming off of DeMoine way. He had his trailer put there & even had a still there. He had his office in the trailer.



dimensions ~ 50 feet X 70 feet (guess)

The site is fenced with gate.

1050 Reviewed manifests at his office

- designate facility Name and site

Chief Chemical
Rt 2 Box 71
Haskell, OK 74436

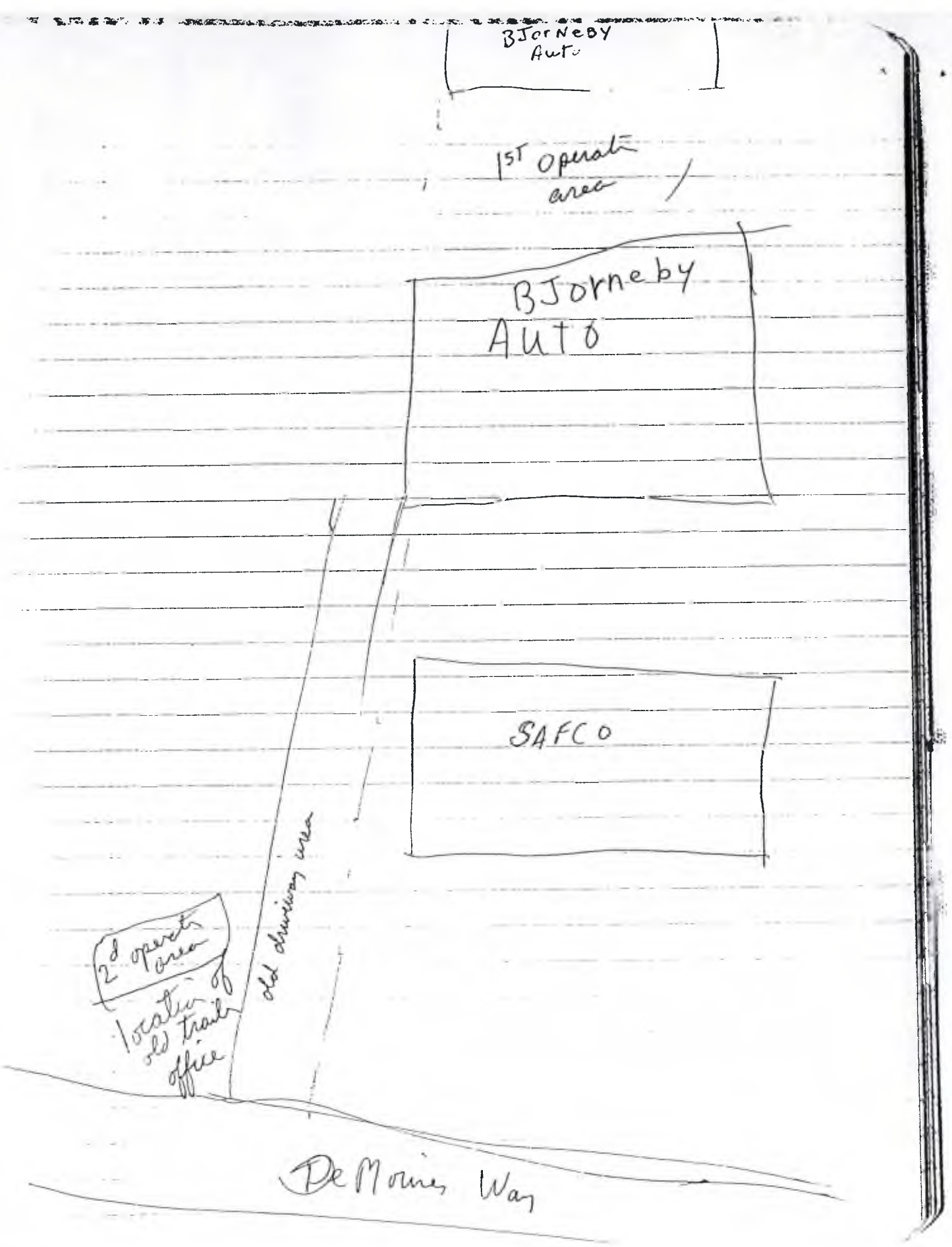
Lafarge / Syeteck
So. Cement Plant Rd.
Fredonia Ks 66736

looked at manifests from 2-1992

drainage of site appears to be to the S.W. The SW corner of the property drops off & is lower. West side also is lower.

- the covered storage area had the southwest corner off. the wind blew it down

- the roof has no overhang and drums along outside edge have standin' water on lids


BJorneby Auto
1st operation area
BJorneby AUTO
SAFCO
2d operations area
location old trailer office
old driveway area
De Moines Way

Talked briefly with BJ (Robert) Bjorneby who owns the site & leases to Safco.

He bought the property in 1976 after leasing it for 3 years.

SAFECO

MEMORANDUM

DCN: TZ4-C10021-EP-10164

DATE: April 14, 1992

TO: Deborah Robinson

FROM: Louis Craig, SAIC/TSC

SUBJECT: RPA Recommendations for Safco Environmental,Seattle,Washington
EPA No. 68-W9-0008, SAIC/TSC Project No. 6-788-03-1400-220

A RCRA Preliminary Assessment was conducted at the Safco Environmental (Safco) facility located in Seattle, Washington. Seven solid waste management units (SWMUs) were identified and evaluated in the course of this assessment. A summary of the conclusions regarding release potentials from each of the SWMUs identified during the RPA is presented below:

SUMMARY OF ONGOING RELEASE POTENTIALS
OF SWMUs AT SAFCO

SWMU No.	Description	Soil	Ground Water	Surface Water	Air	Subsurface Gas
1	Former Safco Operations Area	L	L	L	L	L
2	Former Distillation Unit	L	L	L	L	L
3	Container Storage Unit	M	L/M	L/M	L	L
4	Vehicle Parking Area	H	M	M	L	L
5	Loading Dock	U M*	U L*	U L*	L	L
6	Flatbed Storage Trailer	M	L/M	L/M	L	L
7	Abandoned Vehicle Storage Area	U	U	U	L	L

L = Low
M = Medium
H = High
U = Unknown

*Potential for releases from past practices

In additional to SWMU-specific recommendation made below, SAIC/TSC recommends that a RCRA compliance evaluation inspection be conducted at this facility to fully characterize that nature of all wastes stored at the facility and to gain more information on current waste management practices.

Recommendations for further action at each SWMU are summarized below. Based on the results of the evaluation performed at the facility, no further action under corrective action authorities is recommended for the following units:

SWMU 1 - Former Safco Operations Area
SWMU 2 - Former Distillation Unit

Recommended corrective action for all other units is described below.

SWMU 3: CONTAINER STORAGE UNIT

Suggested Action: It is recommended that soil samples be taken from the pit on the southwest corner of the unit that receives surface runoff from the pad. Samples should be sampled for priority pollutants. It is recommended that Safco provide a roof for this unit that prevents infiltration of rainwater onto the storage pad. Additionally, it is recommended that the ground surface adjacent to the north side of the pad be paved, graded, and bermed such that spills occurring during waste transfer (loading/unloading) procedure may be contained.

SWMU 4: VEHICLE PARKING AREA

Suggested Action: It is recommended that surficial soil samples be taken at this unit and analyzed for priority pollutants. It is also recommended that if Safco intends to use vehicles for storage of solid or hazardous wastes for longer than a 24 hour period, that an impermeable surface be provided for the parking area. Another alterative would be for Safco to move all drums from their vehicles to the container storage unit (SWMU 3) in they are on site for longer than 24 hours.

SWMU 5: LOADING DOCK

Suggested Action: It is recommended that additional information be obtained about the wastes currently stored at this unit to determine if they are hazardous wastes and should be managed as such. Additionally, it is recommended that the ground surface adjacent to the dock be paved, graded, and bermed such that spills occurring during waste transfer (loading/unloading) procedure may be contained.

SWMU 6: FLATBED STORAGE TRAILER

Suggested Action: It is recommended that additional information be obtained about the wastes currently stored at this unit to determine if they are hazardous wastes and should be managed as such. If it is confirmed that materials stored in these drums are hazardous wastes or solid wastes containing hazardous constituents, it is recommended that soil sampling adjacent to the unit for those hazardous constituents be performed. Additionally, it is recommended that if this unit is used to store wastes containing hazardous constituents for long term (longer than 24 hours) storage, secondary containment be provided for the unit.

SWMU 7: ABANDONED VEHICLE STORAGE AREA

Suggested Action: It is recommended that additional information be obtained about the wastes currently stored at this unit to determine if they are hazardous wastes and should be managed as such. Additionally, it is recommended that if this unit is used to store wastes containing hazardous constituents for long term (longer than 24 hours) storage, secondary containment be provided for the unit.

Please feel free to contact Kathryn Gladden or myself at 206/485-2818 if you have any questions or comments regarding this memorandum.

Enclosure

cc: M. Bailey, EPA RCRA Site Manager
M. Slater, EPA Region 10 RCRA EPI Coordinator
P. Rubenstein, EPA Region 10 CERCLA Project Officer
T. Tobin, SAIC/TSC RPM
K. Gladden, SAIC/TSC WAM

SAFECO

United States
Environmental Protection
Agency

Region 10
1200 Sixth Avenue
Seattle WA 98101

Alaska
Idaho
Oregon
Washington

EPA

MAY 8 1992

Reply to
Attn. of: HW-104

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

James E. Johnson
Safco Environmental
1255 South 188th Street
Seattle, Washington 98148

Re: Visual Site Inspection at Safco Environmental
EPA ID No.: WAD 98097 4869

Dear Mr. Johnson:

This letter is in follow-up to the visual site inspection (VSI) of the former Safco Environmental site at 2212 South 144th Street, Seattle, Washington which was carried out on April 15, 1992, at 10:00 a.m.

The VSI was performed by SAIC/TSC, a contractor to the U.S. Environmental Protection Agency (EPA). SAIC/TSC is an authorized contractor of EPA (Contract No. 68-W9-0008) and is acting as field investigators for EPA.

This VSI is intended to meet the requirements of two hazardous waste programs administered by EPA, as described below:

1. SUPERFUND: Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. 9604(e) authorizes EPA to gain access to, and request information from, sites where any hazardous substances or pollutants or contaminants may have been generated, stored, treated, disposed of, or transported from.

   EPA Region 10 and the Washington Department of Ecology identified Safco Environmental during preliminary assessment screening as a site which requires additional information to accurately profile the nature and extent of past waste disposal activity at the site.

   Safco Environmental was inspected to determine the impact or potential impact on the environment of any hazardous substances which may exist in an uncontrolled manner at this location.

Enclosed is a CERCLA Information Needs checklist. You must provide the information outlined in the list within 30 days of your receipt of this letter, or at the time of the VSI (whichever is later). Failure to do so may subject the facility to enforcement action under Section 104(e) of CERCLA, 42 U.S.C. § 9604(e)(5). Such enforcement action could include the assessment of penalties up to $25,000 per day of noncompliance. Pursuant to Section 103 of CERCLA, 42 U.S.C. § 9603, it is unlawful for any person knowingly to destroy, mutilate, erase, dispose of, conceal, or otherwise render unavailable or unreadable, or falsify, any of the requested records.

2. RCRA: The Hazardous and Solid Waste Amendments of 1984 (HSWA) establish the authority in the Resource Conservation and Recovery Act (RCRA) program to address releases of hazardous waste or hazardous constituents, including those from solid waste management units (SWMUs). This program applies to operating, closed, or closing RCRA treatment, storage or disposal facilities. The RCRA Facility Assessment (RFA) is a mechanism which the EPA utilizes to carry out the corrective action authorities of HSWA.

Specifically, the RFA is the initial step in the corrective action process. In the RFA, EPA identifies all SWMUs at a facility and determines the potential for releases of waste from the units. The corrective action authorities allow the RCRA program to detect and correct releases from regulated waste management units as well as those units resulting from past waste management practices at RCRA - regulated facilities. Releases to all media (air, soils, and surface and ground waters) from all waste units are within the jurisdiction of the RCRA corrective action program. EPA is currently responsible for implementing this program in Washington, Oregon, and Alaska; Idaho is authorized to implement its own corrective action program.

EPA is currently conducting a RFA for the Safco Environmental facility.

Section 3007 of RCRA, provides EPA with the authority to request certain information from any person who handles or has handled hazardous waste {42 U.S.C. Sec. 6927}. Therefore, pursuant to Section 3007 of RCRA, EPA hereby requests that you submit the information in "RCRA Information Needs" to this letter. In obtaining the requested information, all applicable facility records should be reviewed, including the personal recollections of longtime employees and past owners and operators. The information requested must be submitted within 30 days of your receipt of this letter.

Failure to submit the requested information within the time period specified or failure to adequately explain the basis of such failure constitutes a violation of Section 3007(a) or RCRA and may subject you to enforcement action under Section 3008 of RCRA {42 U.S.C §6928}. Such enforcement action could include the assessment of substantial civil penalties of up to $25,000 for each day of noncompliance.

The information requested pursuant to both CERCLA and RCRA must be mailed to the address below within 30 days of your receipt of this letter. If mailed, please address to:

Kathryn Gladden
SAIC/TSC
18702 North Creek Parkway, Suite 211
Bothell, Washington 98011

EPA requests that your response and submittals to this request for information be accompanied by the enclosed certificate, signed and dated by an authorized official or agent of Safco Environmental.

Safco Environmental may assert a claim of business confidentiality covering any part of the information submitted. EPA regulations governing confidentiality of business information are set forth in Part 2, Subpart B of Title 40 of the Code of Federal Regulations. See, 41 Fed. Reg. 36902-36925 (September 1, 1976), as amended by 43 Fed. Reg. 40000 (September 8, 1978), 44 Fed. Reg. 17673 (March 23, 1979), 48 Fed. Reg. 11270 (March 17, 1983) and 50 Fed. Reg. 61661 (December 18, 1985). For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.200. The information will be disclosed only to the extent, and by means of, the procedures specified in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with your response to this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice to you.

This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, Title 44 of the U.S. Code.

A list of SWMUs, and lists of RCRA and CERCLA information needs for you to provide to the inspection team is enclosed.

If you have any questions regarding this letter or the RFA process, please contact Marcia Bailey of my staff at (206) 553-0684.

Sincerely,

Randall F. Smith

Randall F. Smith, Director
Hazardous Waste Division

Enclosures
Agenda
Information Needs Lists
Certificate

cc: K. Gladden, SAIC/TSC
B. Smith, Washington Department of Ecology
M. Babich, Boeing Commercial Airplane Group

ATTACHMENT I
RCRA FACILITY ASSESSMENT
VISUAL SITE INSPECTION AGENDA

FACILITY: Safco Environmental
2212 South 144th Street
Seattle, WA 98148

EPA ID NO.: WAD980974869

EPA/CONTRACTOR/STATE PERSONNEL: Louis Craig
Kathryn Gladden

PURPOSE OF INSPECTION

The Hazardous and Solid Waste Amendments of 1984 (HSWA) broaden the scope of EPA's authority under RCRA by requiring corrective action for releases of hazardous wastes and hazardous constituents at facilities that manage hazardous wastes. The RCRA Facility Assessment (RFA) is conducted to evaluate the potential for releases to the environment and the need for corrective action.

In addition, under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. 9604(e), a preliminary assessment (PA) is performed to determine the impact or potential impact on the environment of any hazardous substances which may exist in an uncontrolled manner at a facility.

Both processes include a preliminary review of available file information, a visual site inspection (VSI) of the facility and, if necessary, a sampling visit.

The purpose of the VSI is to:

- Identify solid waste management units (SWMUs) and other areas of concern. **A SWMU is defined as any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.**
- Interview site representatives and review or collect facility information provided by site representatives.
- Perform a site walk-through and visual inspection with the site representative.
- Take photographs of the site, including photographs of all SWMUs, and other areas of concern.

VSI

The inspection team has met with James Johnson (Safco) and representatives of Boeing Commercial Airplane Group (currently property owner) at the former Safco site on April 15, 1992. Two SWMU's were identified as a result of this meeting.

SWMUs IDENTIFIED:

SWMU 1 - Former Loading Dock
SWMU 2 - Former Truck Parking Area(s)

ATTACHMENT II

RCRA INFORMATION NEEDS

1. Provide a detailed topographic map of the facility.

2. Provide a map which identifies the location of facility property boundaries and all SWMUs listed in Attachment I. (at a scale of 1"= 200')

3. Submit any available information that identifies all past activities of owners/lessors prior to Safco Environmental at this site which involved generation, treatment, or storage of wastes. Provide types of wastes generated, treated, or stored, and disposition of all wastes, if known.

4. Provide the dates that Safco Environmental started and ceased operations at this site.

5. Supply any available analytical data for all hazardous waste streams which may have been generated at the facility: (for example: wastewater, sludge, and contaminated soil). Indicate quantities of these wastes managed on an annual basis and disposal practices.

6. Identify all types of non-hazardous solid wastes (such as waste oil) which were stored at the facility. Identify on-site storage locations and dates materials were stored at these locations.

7. Provide any groundwater, air, soil sampling data collected at the facility including any soil disposed from the site.

8. Make available for review all copies of the facility spill records.

9. Provide the following for SWMU 1 (Former Loading Dock):

   (a) As-built drawings of loading dock.
   (b) Date the unit was constructed.
   (c) Type of secondary containment.
   (d) Details on any structural modifications (such as berming) performed during the active life of the unit.
   (e) Storage capacity (i.e. number of drums) for the unit.
   (f) Type of ground cover adjacent to the dock.

10. Provide the following for SWMU 2 (Former Truck Parking Area(s):

    (a) Date the unit became active.
    (b) Indicate the types of wastes stored at this unit.
    (c) Type of ground cover where vehicles were parked.

11. For any additional current or former SWMUs at the facility that are not included in the list on Attachment I, provide the following information:

    (a) Unit description:
        - Location
        - Construction details
        - Engineering drawings (as builts, if available)
        - Capacity
    (b) Dates of operation.
    (c) Operational status (active, inactive, closed).
    (d) Waste types, quantities, sources, and disposition.
    (e) Release controls.
    (f) History of leaks, spills, or other uncontrolled releases.
    (g) Description of inspection and maintenance procedures to assure integrity of the unit.

CERCLA INFORMATION NEEDS

1. General Information

- Site Name
- Street Address
- Phone Number
- Name of parent company, if any
- Previous property/facility owners
- Names
- Addresses
- Years of ownership
- Total area of site (in acres)
- Description of site security, if any (i.e., fenced, patrolled, etc.)
- Description of land uses immediately surrounding the site boundaries
- Water supply source(s)

2. Site Map with the Following Items Identified

- All waste storage/disposal areas (buildings, piles, etc.), including SWMUs.
- Well locations (production wells, monitoring wells, abandoned wells).
- Site entrance locations.
- Building names and their general functions.
- Outside process areas.
- Storage tanks (above and below ground, size, contents)
- Waste treatment systems (if present).

3. Waste Summary

- Waste types generated or stored on site (e.g., sludge, solvents, pesticides, acids, bases, etc.)
- Chemical constituents of each waste (if known).
- Feedstocks containing hazardous materials.
- Type of storage and/or final disposition (i.e., landfilled on site, transported from site by recycling firm, etc.)
- Volumes of each waste type generated annually and total volume present on site.
- Description of any waste treatment systems (i.e., flocculation/ filtration, incinerators, chemical/physical treatment, volume reduction, etc.)
- Names of waste transporters/recyclers, and the time period they have been used.

4. List of Permits and Applications, including permit #, date of issue, and expiration date (i.e., NPDES, UIC, air, RCRA, SPCC Plan, state, local, etc.)

5. Past/Present Sampling/Monitoring Activities:

- Summary of sampling/monitoring programs.
- Hydrogeological studies prepared for the site.

CERTIFICATE

I certify, pursuant to 28 U.S.C. §1746, under penalty of perjury, that the information and representations set out in the foregoing response to EPA's request for information, pursuant to Section 3007 of RCRA 42 U.S.C. §6927, and Section 104(e) of CERCLA, 42 U.S.C. §9604(e), is true and correct to the best of my information, knowledge and belief, and that I have made a reasonable inquiry into the truth and correctness about such information and representations,

_____ Date

_____ Authorized Official or Agent

ROUTING AND TRANSMITTAL SLIP

Date: 5.20.92

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. MARCIA		
2.		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate	✓	For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

PROOF (?) OF STORAGE BY SAFCO SAFE TRANSPORT IN OREGON

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
PAUL	Phone No.

5041-102 ☆ U.S. GPO: 1986—491-247/40002

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

SAFECO

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MTD986068963 | Manifest Document No. 1.1.13.9 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address (Shipper)
THERMAL ENERGY
1555 MONTANA HWY 206
COLUMBIA FALLS, MT 59912

4. Generator's Phone (406) 756-3220

A. State Manifest Document Number: 11139
B. State Generator's ID:

5. Transporter 1 Company Name: SAFCO SAFE TRANSPORT
6. US EPA ID Number: ORD982654899
C. State Transporter's ID:
D. Transporter's Phone: (206) 243-3115

7. Transporter 2 Company Name: ENVIRO CHEM
8. US EPA ID Number: UTD046118295
E. State Transporter's ID:
F. Transporter's Phone: (801) 225-5659

9. Designated Facility Name and Site Address
CHIEF CHEMICAL
Rt 2 BOX 71
HASKELL, OK 74436
10. US EPA ID Number: OKD089751290
G. State Facility's ID:
H. Facility's Phone: (918) 482-5271

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE FLAMMABLE LIQUID N.O.S. (CHM= Toluene, Acetone) UN 1993 (D001) (RQ= 10)	X	001	DM	003.50	G	F002, F005 F003, D001 *see J.
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above: D018, D035, D040
* See attached manifest # list
* shipper only of Conditionally Exempt generator waste

K. Handling Codes for Wastes Listed Above: PROFILE # 91-1550

15. Special Handling Instructions and Additional Information
In case of spill of reported RQ, emergency contact is Jim Johns at (206) 242-2610 and/or Curt Juma at (206) 474-3134.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name | Signature | Month | Day | Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Wolfgang Trask
Signature: Wolfgang Trask
Month: 11 Day: 13 Year: 91

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: DOLYN KNAPP
Signature: Dolyn Knapp
Month: 11 Day: 14 Year: 91

19. Discrepancy Indication Space: #1, DATED ON LINE 18, THEN scrimbled the DATE out.

FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month | Day | Year

TRANSPORTER #2

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	~~ORD 980 837 199~~
Manifest Document No.	~~03498~~
2. Page 1 of 1	
Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address	Eastside Plating 8310 S.E. 26th Pl. Portland, OR 97214
4. Generator's Phone	(503) 233-8554
A. State Manifest Document Number	03498
B. State Generator's ID	
5. Transporter 1 Company Name	Safco Safe Transport
6. US EPA ID Number	ORD 982 654 899
C. State Transporter's ID	
D. Transporter's Phone	(206) 243-3115
7. Transporter 2 Company Name	EnviroChem
8. US EPA ID Number	UTD 046118355
E. State Transporter's ID	
F. Transporter's Phone	801 273 5655
9. Designated Facility Name and Site Address	Washington Chemical E. 3828 Queen Ave. Spokane, WA 99207
10. US EPA ID Number	WAD 037 991 528
G. State Facility's ID	
H. Facility's Phone	(509) 489-9176

	HM	11. US DOT Description (*Including Proper Shipping Name, Hazard Class, and ID Number*)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Hazardous Waste Liquid n.o.s. ORM-E NA 9189 ~~RQ~~ (1,1,1 Trichloroethane) ~~RQ (10)~~	001	DM	[illegible]	G	F001
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above

Additional Facility: CHIEF CHEMICAL
RT 2 Box 71 (918) 482-5271
Haskell, OK 74436 OKD 089751290

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

In case of accidental spill of reported RQ, contact Jim Johnson at (206) 243-3115.
Ultimate intended destination is: Gibraltar Resources, TX. BBL# P4
[illegible]

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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Printed/Typed Name	Signature	Month	Day	Year
STEVE EASON	[signature]	06	19	91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
BRIAN L MATHERS	[signature]	06	19	91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Mary [illegible]	[signature]	07	22	91

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

33 days

TRANSPORTER #2

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ORD 982 654 132
Manifest Document No.: 33432
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
J & M Auto Body
16420 S.E. McLaughlin
Milwaukee, OR 97045

4. Generator's Phone (503) 653-3500

A. State Manifest Document Number: 3498
B. State Generator's ID:

5. Transporter 1 Company Name: Safco Safe Transport
6. US EPA ID Number: ORD 982 654 399
C. State Transporter's ID:
D. Transporter's Phone (206) 243-3115

7. Transporter 2 Company Name: [illegible]
8. US EPA ID Number: [illegible]
E. State Transporter's ID:
F. Transporter's Phone [illegible]

9. Designated Facility Name and Site Address:
Washington Chemical
E. 3823 Queen Ave.
Spokane, Wa. 99207

10. US EPA ID Number: WAD 037 991 523
G. State Facility's ID:
H. Facility's Phone: (509) 489-9176

	HM	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	WASTE FLAMMABLE LIQUID N.O.S. UN1993 (HM= Acetone, Toluene) (RQ= 100)	003	DM	165	G	D001, F003 F005
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above

Alternate Facility: CHIEF CHEMICAL
RT 2 Box 71 (918)482-5271
Haskell, OK 74436 OKD089751290

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information: In case of accidental spill of reported RQ. Contact Jim Johnson at (206) 242-3389. Ultimate intended destination is: ~~Gibraltar Resources, TX.~~ BBL# F5 P6, P7 3,4,3,5,37

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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Printed/Typed Name: James F. Justice | Signature: [signature] | Month 06 Day 19 Year 91

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian L. Mathers | Signature: [signature] | Month 06 Day 17 Year 91

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible] | Signature: [signature] | Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Month Day Year

GENERATOR / TRANSPORTER / FACILITY

33 days

TRANSPORTER #2

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
ORD 076 413 335	03643		

GENERATOR

3. Generator's Name and Mailing Address
J & M IMPORTS
123 So. McLoughlin Blvd.
Oregon City, OR 97045

A. State Manifest Document Number: 03643

B. State Generator's ID:

4. Generator's Phone (503) 655-1109

5. Transporter 1 Company Name: Safco Safe Transport

6. US EPA ID Number: ORD 982 654 899

C. State Transporter's ID:

D. Transporter's Phone: ~~(206) 243-3146~~

7. Transporter 2 Company Name: EnviroChem

8. US EPA ID Number: UTD 046 118 295

E. State Transporter's ID:

F. Transporter's Phone: ~~(801) 225-5050~~

9. Designated Facility Name and Site Address
Chief Chemical
Rt 2 Box 71
Haskell, OK 74436

10. US EPA ID Number: OKD 089 751 290

G. State Facility's ID:

H. Facility's Phone: (918) 482-5271

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE FLAMMABLE L.Q. n.o.s. (HM= Xylene, Toluene (RQ= 100) UN 1993 (D001)	X	002	DM	.071	G	F003, F005 D001
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
Contains: Xylene, Toluene, N-butyl Alcohol, Methanol, MIBK
Acetone, Isobutanol, Ethyl ether, Ethyl Acetate,
Alternate/Additional Transportation

K. Handling Codes for Wastes Listed Above
BBL#
BBL 26, 48

15. Special Handling Instructions and Additional Information: In case of reported RQ, emergency contact is Jim Johnson at (206)242-2610 and/or Curt Juma at (206)474-3134.

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Printed/Typed Name: Bill TRUE — Signature — Month/Day/Year: 09/10/91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian L. Mathers — Signature — Month/Day/Year: 09/10/91

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Dolyn Knapp — Signature — Month/Day/Year: 09/12/91

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name — Signature

14 days

TRANSPORTER #2

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ORD 982 654 469
Manifest Document No. 03644
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
De Vault's Unitech
2227 S.E. 7th Ave.
Portland, OR 97214

4. Generator's Phone (503) 232-3300

A. State Manifest Document Number 03644

B. State Generator's ID

5. Transporter 1 Company Name: Safco Safe Transport
6. US EPA ID Number: ORD 982 654 899

C. State Transporter's ID
D. Transporter's Phone ~~(206) 243-3115~~

7. Transporter 2 Company Name: EnviroChem
8. US EPA ID Number: UTD 046 118 295

E. State Transporter's ID
F. Transporter's Phone ~~(801) 225-5053~~

9. Designated Facility Name and Site Address
Chief Chemical
Rt 2 Box 71
Haskell, OK 74436

10. US EPA ID Number: OKD 089 751 290

G. State Facility's ID

H. Facility's Phone (918) 482-5271

	HM	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	WASTE FLAMMABLE LIQUID N.O.S. (HM= Toluene, Xylene (RQ= 100) UN 1993 (D001	002	DM	110	G	F003,F005 DC01,D035
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
Contains: Toluene, Xylene, Methyl Ethyl Ketone, Ethyl Acetate, N-butyl Alcohol
Alternate/Additional Transportation

K. Handling Codes for Wastes Listed Above
BBL# P15, P16
BBL# 30, 47

15. Special Handling Instructions and Additional Information
In case of spill of reported RQ, emergency contact is Jim Johnson at (206)242-2610 and/or Curt Juma at (206)474-3134.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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Printed/Typed Name: Edward L. DeVault | Signature: Edward L. DeVault | Month 09 Day 12 Year 91

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian L. Mathers | Signature: [signature] | Month 09 Day 12 Year 91

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Dolyn Knapp | Signature: Dolyn Knapp | Month 09 Day 24 Year 91

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature

12 days

TRANSPORTER #2

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ORD 987190469 | Manifest Document No.: 03733 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
J&M Auto Import Rebuilders
16700 SE McLaughlin
Milwaukee, Or 97045

4. Generator's Phone (503) 653-2435

A. State Manifest Document Number: 03733
B. State Generator's ID:

5. Transporter 1 Company Name: Safco Safe Transport
6. US EPA ID Number: ORD 982 654 899
C. State Transporter's ID:
D. Transporter's Phone: (206) 243-3115

7. Transporter 2 Company Name: EnviroChem
8. US EPA ID Number: UTD 046 118 295
E. State Transporter's ID:
F. Transporter's Phone: (801) 225-5669

9. Designated Facility Name and Site Address
Chief Chemical
Rt 2 Box 71
Haskell, OK 74436
10. US EPA ID Number: OKD 089 751 290
G. State Facility's ID:
H. Facility's Phone: (918) 482-5271

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a.	WASTE FLAMMABLE LIQUID n.o.s. (HM=XYLENE TOLUENE) (RQ=100) UN 1993 (D001)	X	002	DM	110	G	F003 F005 D001
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
Contains: ACETONE, XYLENE, TOLUENE
ADDITIONAL/ALTERNATE TRANSPORTATION

K. Handling Codes for Wastes Listed Above
BBL# P7P8
BBL# 26,42

15. Special Handling Instructions and Additional Information
In case of accidental spill of reported RQ, emergency contact is Jim Johnson at (206)242-2610 and/or Curt Juma at (206)474-3134.

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Printed/Typed Name: Keith Konsten | Signature: Keith Konsten | Month 10 Day 30 Year 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian L. Mathers | Signature: Brian L Mathers | Month 10 Day 30 Year 91

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: DOLYN KNAPP | Signature: Dolyn Knapp | Month 11 Day 4 Year 91

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature

15 days

TRANSPORTER #2

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: O·R·D·9·8·2·6·5·4·1·3·2
Manifest Document No.: 03734
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
J&M Body Shop
16420 SE McLaughlin
4. Generator's Phone (503) 653-5500 Milwaukee, Or 97045

A. State Manifest Document Number: 03734
B. State Generator's ID:

5. Transporter 1 Company Name: Safco Safe Transport
6. US EPA ID Number: ORD 982 654 839
C. State Transporter's ID:
D. Transporter's Phone: (206) 243-3115

7. Transporter 2 Company Name: EnviroChem
8. US EPA ID Number: UTD 046 118 295
E. State Transporter's ID:
F. Transporter's Phone: (801) 225-5659

9. Designated Facility Name and Site Address
Chief Chemical
Rt 2 Box 71
Haskell, OK 74436
10. US EPA ID Number: OKD 089 751 290
G. State Facility's ID:
H. Facility's Phone: (918) 482-5271

	HM	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.		WASTE FLAMMABLE LIQUID n.o.s. (HM=xylene TOLUENE) UN 1993 (D001) (RQ= 100)	003	DM	165	G	F003 F005 D001 #see J.
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above: D008
Contains: Acetone, xylene TOLUENE
ALTERNATE/ADDITIONAL TRANSPORTATION PROFILE H 91-1381 BBL 31, 32, 41

K. Handling Codes for Wastes Listed Above: BBL# PV, PB, P6

15. Special Handling Instructions and Additional Information
In case of accidental spill of reported RQ, emergency contact is Jim Johnson at (206)242-2610 and/or Curt Juma at (206)474-3134.

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Printed/Typed Name: JAMES F JUSTICE
Signature:
Month 10 Day 30 Year 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian L. Mathers
Signature:
Month 10 Day 30 Year 91

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: DOLYN KNAPP
Signature: Dolyn Knapp
Month 11 Day 4 Year 91

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name
Signature

15 days

TRANSPORTER #2

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ORD076413335 | Manifest Document No. 03735 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: J&M Imports, 128 So. McLoughlin Blvd., Oregon City, Or. 97045

4. Generator's Phone (503) 655-1109

A. State Manifest Document Number: 03735

B. State Generator's ID:

5. Transporter 1 Company Name: Safco Safe Transport | 6. US EPA ID Number: ORD 982 654 899 | C. State Transporter's ID: | D. Transporter's Phone: (206) 243-3115

7. Transporter 2 Company Name: EnviroChem | 8. US EPA ID Number: UTD 046 118 295 | E. State Transporter's ID: | F. Transporter's Phone: (801) 225-5659

9. Designated Facility Name and Site Address: Chief Chemical, Rt 2 Box 71, Haskell, OK 74436 | 10. US EPA ID Number: OKD 089 751 290 | G. State Facility's ID: | H. Facility's Phone: (918) 482-5271

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	WASTE FLAMMABLE LIQUID n.o.s. (HM=Xylene Toluene) UN 1993 (D001) (RQ=100)	X	001	DM	015	G	F003 D001
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above: Contains: Xylene, Toluene Acetone; ALTERNATE/ADDITIONAL TRANSPORTATION

K. Handling Codes for Wastes Listed Above: BBL #9; BBL 443

15. Special Handling Instructions and Additional Information: In case of accidental spill of reported RQ, emergency contact is2 Jim Johnson at (206)242-2610 and/or Curt Juma at (206)474-3134.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Sharon Jamieson | Signature: Sharon Jamieson | Month 10 | Day 30 | Year 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Brian L. Mathers | Signature: Brian L Mathers | Month 10 | Day 30 | Year 91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: DOLYN KNAPP | Signature: Dolyn Knapp | Month 11 | Day 14 | Year 91

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature

15 days

TRANSPORTER #2

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: O.R.D.9.8.7.1.8.8.4.2.2 | Manifest Document No.: 03736 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
United Express Airlines
8540 N.E. 47th Ave.
Portland, Or 97218

4. Generator's Phone (503) 249-4385

A. State Manifest Document Number: 03736

B. State Generator's ID:

5. Transporter 1 Company Name: Safco Safe Transport
6. US EPA ID Number: . ORD .982. 654 899 .
C. State Transporter's ID:
D. Transporter's Phone: (206) 243-3115

7. Transporter 2 Company Name: EnviroChem
8. US EPA ID Number: . UTD .046. 118 295 .
E. State Transporter's ID:
F. Transporter's Phone: (801) 225-5659

9. Designated Facility Name and Site Address
Chief Chemical
Rt 2 Box 71
Haskell, OK 74436
10. US EPA ID Number: . OKD .089. 751 290 .
G. State Facility's ID:
H. Facility's Phone: (918) 482-5271

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	WASTE FLAMMABLE LIQUID n.o.s. (HM=) UN 1993 (D001) (RQ=)			DM		G	
b.	WASTE COMBUSTIBLE LIQUID NOS N.A. 1993		002	DM	110	G	
c.							
d.							

J. Additional Descriptions for Materials Listed Above
Contains:

K. Handling Codes for Wastes Listed Above
BBL# PLP2
BBL# 19, 27.

15. Special Handling Instructions and Additional Information
In case of accidental spill of reported RQ, emergency contact is2 Jim Johnson at (206)242-2610 and/or Curt Juma at (206)474-3134.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: Terry Giese | Signature | Month 10 | Day 30 | Year 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Brian L. Mathers | Signature | Month 10 | Day 30 | Year 91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: DOLYN KNAPP | Signature | Month 11 | Day 4 | Year 91

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature

15 days

TRANSPORTER #2